

DAS:VR/SLT  
F.#2010R01816

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

CHRISTOPHER BARRET, et al.,

Defendants.

S T I P U L A T E D  
P R O T E C T I V E  
O R D E R

10 CR 809 (KAM)

- - - - -X

Pursuant to Federal Rule of Criminal Procedure 16(d), it is hereby stipulated and agreed by and between the United States of America, by Assistant United States Attorneys SreeVamshi C. Reddy and Steven L. Tiscione, and the undersigned Defendant and Defense Counsel that this Order shall govern production of Personal Information, as that term is defined below, to the Defendant and Defense Counsel, and the Court Orders as follows:

Definitions

1. Certain terms as used in this Order shall be defined as follows:

a. The "Defense" shall mean the undersigned defendant ("Defendant"), counsel of record for the Defendant ("Defense Counsel"), additional attorneys assisting Defense Counsel, paralegal(s) assisting Defense Counsel and expert(s) retained by or on behalf of the Defendant ("Retained Expert(s)").

b. "Personal Information" shall mean identifying information including, but not limited to, personal historical and pedigree information of individuals other than the Defendant, to include dates of birth, full and partial social security numbers, addresses, email addresses, credit reporting information, bank account numbers, unique personal identifiers (including personal identification numbers ("PINs") and passwords), telephone numbers, medical information and other information of this nature.

Application of Order

2. This Order shall apply to all discovery containing Personal Information ("Confidential Material") heretofore produced by the United States to Defense Counsel in the above-captioned case, and to any such additional discovery produced by the United States to Defense Counsel in the future in the above-captioned case.

Inspection by Defense Counsel

3. By signing a copy of this Order, Defense Counsel acknowledges that s/he has read, understands and is bound by the terms of this Order. If there are additional attorneys assisting Defense Counsel, each additional attorney must read this Order, sign the attached Acknowledgment and file the executed Acknowledgment by ECF before having access to Confidential Material.

4. Defense Counsel may inspect the Confidential Material, subject to the terms and conditions of this Order.

5. Defense Counsel may take notes concerning any Confidential Material, but any notes that specifically copy Personal Information must be stored at the office of Defense Counsel or the office of the Retained Expert(s) in a locked room or on one or more password-protected computers. Upon the conclusion of the criminal case pending against the Defendant and any subsequent appeals, Defense Counsel shall shred or delete any notes containing Personal Information.

6. Defense Counsel may print paper copies of discovery containing Personal Information that may assist Defense Counsel in connection with this case (including investigation, trial preparation, plea negotiations, trial, sentencing and appeal). All such records, documents and files printed by the Defense shall be stored in a locked safe at the office of Defense Counsel or the office of Retained Expert(s) when not being used by the Defense in furtherance of the defendant's investigation, trial preparation, plea negotiations, trial, sentencing and appeal, and shall be shredded by Defense Counsel upon the conclusion of the criminal case pending against the Defendant and any subsequent appeals.

7. Defense Counsel shall not provide copies of discovery containing Personal Information to the Defendant to

retain in a location outside of Defense Counsel's office unless such documents are redacted by Defense Counsel. Note that Personal Information, as defined above, does not include information that pertains only to the Defendant.

Inspection by Defendant

8. Before having access to Confidential Material, the Defendant must sign a copy of this Order and, by so doing, the Defendant acknowledges that s/he has read, understands and is bound by the terms of this Order.

9. The Defendant may take notes concerning any Confidential Material, but any notes that specifically copy Personal Information must be stored at the office of Defense Counsel.

10. If the Defendant is incarcerated, the Defendant shall not retain copies of documents containing Personal Information with the Defendant's legal papers in the prison unless such documents are redacted by Defense Counsel. Note that Personal Information, as defined above, does not include information that pertains only to the Defendant.

Inspection by Retained Experts and Paralegals

11. Before any Retained Expert or paralegal may have access to Confidential Material, the Retained Expert or paralegal must read this Order and sign the attached Acknowledgment. Defense Counsel shall file the executed Acknowledgment by ECF.

12. Retained Experts and paralegals may take notes concerning any Confidential Material, but any notes that specifically copy Personal Information must be stored at the office of Defense Counsel or the office of the Retained Expert(s) in a locked room or on one or more password-protected computers. All such notes shall be turned over to Defense Counsel at the conclusion of the Retained Expert's or paralegal's work on this case. Defense Counsel shall shred or delete all such notes upon the conclusion of the criminal case pending against the Defendant and any subsequent appeals.

13. Retained Experts and paralegals may print paper copies of records, documents and files contained in the Confidential Material that may assist Defense Counsel in connection with this case (including investigation, trial preparation, plea negotiations, trial, sentencing and appeal). All such records, documents and files printed by Retained Experts and paralegals shall be stored in a locked safe at the office of Defense Counsel or the office of the Retained Expert(s) when not being used by the Defense in furtherance of the defendant's investigation, trial preparation, plea negotiations, trial, sentencing and appeal, and shall be turned over to Defense Counsel upon the conclusion of the Retained Expert's or

paralegal's work on this case. Defense Counsel shall shred such copies upon the conclusion of the criminal case pending against the Defendant and any subsequent appeals.

Use and Maintenance of Confidential Material by the Defense

14. The Defense shall use and maintain the Confidential Material including any copies or notes as follows:

a. The Defense shall use the Confidential Material solely and exclusively in connection with this case (including investigation, trial preparation, plea negotiations, trial, sentencing and appeal) and not for any commercial or other purpose.

b. In no event shall the Defense disclose any Personal Information to any other person or entity other than the United States or this Court. Pleadings containing or attaching Personal Information shall be filed under seal, unless the Personal Information is redacted in accordance with Fed. R. Crim. P. 49.1.

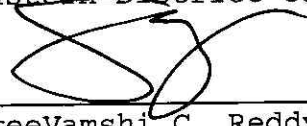
15. Defense Counsel shall promptly notify the Court and the United States in writing if the contents of any Confidential Material are disclosed either intentionally or

unintentionally to anyone not authorized by this Order or further  
order of the Court.

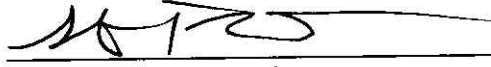
Dated: Brooklyn, New York  
February 11, 2011

LORETTA E. LYNCH  
United States Attorney  
~~Eastern District of New York~~

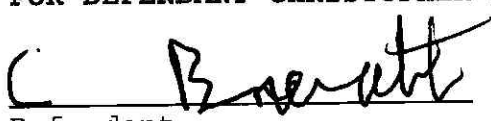
By:


  
SreeVamshi C. Reddy  
Assistant United States Attorney

By:

  
Steven L. Tiscione  
Assistant United States Attorney

**FOR DEFENDANT CHRISTOPHER BARRET:**

  
Defendant

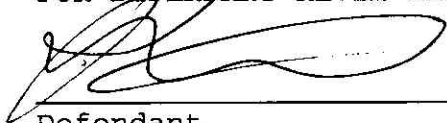
  
Counsel to Defendant

**FOR DEFENDANT KAREEM FORREST:**

\_\_\_\_\_  
Defendant

\_\_\_\_\_  
Counsel to Defendant

FOR DEFENDANT KEVIN LEE:

  
\_\_\_\_\_  
Defendant


  
\_\_\_\_\_  
Counsel to Defendant

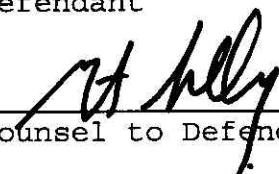
FOR DEFENDANT LATOYA MANNING:

\_\_\_\_\_  
Defendant


\_\_\_\_\_  
Counsel to Defendant


FOR DEFENDANT LEEMAX NEUNIE:

  
\_\_\_\_\_  
Defendant

  
\_\_\_\_\_  
Counsel to Defendant

FOR DEFENDANT VINCENT QUINONES:

  
\_\_\_\_\_  
Defendant

  
\_\_\_\_\_  
Counsel to Defendant



unintentionally to anyone not authorized by this Order or for  
order of the Court.

Dated: Brooklyn, New York  
February , 2011

LORETTA E. LYNCH  
United States Attorney  
Eastern District of New York

By: GreeVamshi C. Reddy  
Assistant United States Attorney

By: Steven L. Tiscione  
Assistant United States Attorney

FOR DEFENDANT CHRISTOPHER BARR

Defendant

Counsel to Defendant

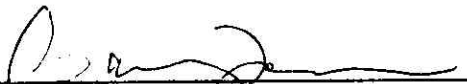
FOR DEFENDANT KAREEM FORREST:

Kareem Forrest  
Defendant

Maurice Selby  
Counsel to Defendant

**FOR DEFENDANT RYAN ANDERSON:**

  
Defendant

  
Counsel to Defendant

**FOR DEFENDANT JOSEPH DONALDSON:**

\_\_\_\_\_  
Defendant

\_\_\_\_\_  
Counsel to Defendant

**FOR DEFENDANT KERRY GUNTER:**

\_\_\_\_\_  
Defendant

\_\_\_\_\_  
Counsel to Defendant

**FOR DEFENDANT CHARLES JONES:**

\_\_\_\_\_  
Defendant

\_\_\_\_\_  
Counsel to Defendant

FOR DEFENDANT RYAN ANDERSON:

\_\_\_\_\_  
Defendant

*Ryan Anderson*  
Counsel to Defendant

FOR DEFENDANT JOSEPH DONALDSON:

*Joseph Donaldson*  
Defendant

*Joel Winogral*  
Counsel to Defendant

FOR DEFENDANT KERRY GUNTER:

*K. Gunter*  
Defendant

*[Signature]*  
Counsel to Defendant

FOR DEFENDANT CHARLES JONES:

*Charles Jones*  
Defendant

*[Signature]*  
Counsel to Defendant

FOR DEFENDANT KEVIN LEE:

\_\_\_\_\_  
Defendant

\_\_\_\_\_  
Counsel to Defendant

FOR DEFENDANT LATOYA MANNING:

*Latoya Manning*  
\_\_\_\_\_  
Defendant

*Scott Foust*  
\_\_\_\_\_  
Counsel to Defendant

FOR DEFENDANT LEEMAX NEUNIE:

\_\_\_\_\_  
Defendant

\_\_\_\_\_  
Counsel to Defendant

FOR DEFENDANT VINCENT QUINONES:

\_\_\_\_\_  
Defendant

\_\_\_\_\_  
Counsel to Defendant

SO ORDERED:

*K. J. ...*  
*US DJ*  
*2/11/11*

FOR DEFENDANT LEON SCARLETT:

L scarlett  
Defendant

[Signature]  
Counsel to Defendant

FOR DEFENDANT ANDRE WILSON:

\_\_\_\_\_  
Defendant

\_\_\_\_\_  
Counsel to Defendant

FOR DEFENDANT KWAUME WILSON:

\_\_\_\_\_  
Defendant

\_\_\_\_\_  
Counsel to Defendant

Dated: Brooklyn, New York  
February 11, 2011

SO ORDERED:

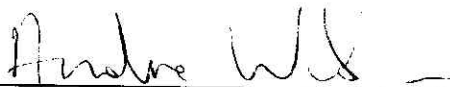
[Signature]  
THE HONORABLE KIYO A. MATSUMOTO  
UNITED STATES DISTRICT JUDGE


FOR DEFENDANT LEON SCARLETT:

\_\_\_\_\_  
Defendant

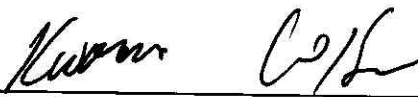
\_\_\_\_\_  
Counsel to Defendant

FOR DEFENDANT ANDRE WILSON:

  
\_\_\_\_\_  
Defendant

  
\_\_\_\_\_  
Counsel to Defendant

FOR DEFENDANT KWAUME WILSON:

  
\_\_\_\_\_  
Defendant

  
\_\_\_\_\_  
Counsel to Defendant

Dated: Brooklyn, New York  
February 11, 2011

SO ORDERED:

  
\_\_\_\_\_  
THE HONORABLE HIYO A. MATSUMOTO  
UNITED STATES DISTRICT JUDGE

DAS:VR/SLT  
F.#2010R01816

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

CHRISTOPHER BARRET, et al.,

Defendants.

ACKNOWLEDGMENT OF  
STIPULATED PROTECTIVE  
ORDER

10 CR 809 (KAM)

- - - - -X

1. I have read and understand the Stipulated Protective Order ("Order") in this case entered in the above-captioned case on February \_\_\_\_\_, 2011.

2. I hereby agree to be bound by the terms of the Order. Specifically, I agree that:

a. I will use the Confidential Material, as that term is defined in the Order, and any copies thereof, solely and exclusively in connection with this case (including investigation, trial preparation, plea negotiations, trial, sentencing and appeal) and not for any commercial or other purpose;

b. I will not disclose any Personal Information, as that term is defined in the Order, to any person who is not authorized to access such material pursuant to the Order;

c. I will advise Defense Counsel of any intentional or unintentional disclosure of Personal Information

to persons not authorized to access such material pursuant to the Order;

d. I will ensure that any records, documents and files I print that contain Personal Information shall be stored in a locked safe at the office of Defense Counsel or the office of an authorized Retained Expert when not being used by the Defense;

e. I will ensure that any notes I create that specifically copy Personal Information are stored at the office of Defense Counsel or the office of an authorized Retained Expert in a locked room or on one or more password-protected computers when not being used by the Defense; and

f. I will advise Defense Counsel of the creation of any copies of Confidential Material and ensure that such copies are turned over to Defense Counsel or destroyed at the end of my work on this case.

4. I hereby confirm that my duties under this Acknowledgment shall survive the termination of this case and are binding upon me for all time. I hereby consent to the personal jurisdiction of the United States District Court for the Eastern



District of New York, in the above-captioned case, for purpose of enforcing the aforementioned Protective Order.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Position

\_\_\_\_\_  
Company/Employer

DAS:VR/SLT  
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Date

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Signature

\_\_\_\_\_  
Printed Name

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Position

\_\_\_\_\_  
Company/Employer